

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MEI KUM CHU, SAU KING CHUNG, and
QUN XIANG LING, individually and on
behalf of all others similarly situated,
Plaintiffs,

- against -

CHINESE-AMERICAN PLANNING
COUNCIL HOME ATTENDANT
PROGRAM, INC.,

Defendant.

Case No.: 21-cv-2115 (AT)

**DECLARATION OF MICHAEL
TAUBENFELD**

MICHAEL TAUBENFELD hereby declares the following pursuant to 28 U.S.C. §1746:

1. I am a principal Fisher Taubenfeld LLP, which, along with the TakeRoot Justice, represents Plaintiffs in the above-captioned action, and as such I am familiar with the facts and circumstances of the within action to the extent set forth herein. I submit this declaration in support of Plaintiffs' motion to remand
2. Attached are the following exhibits:
 - a. Exhibit 1 – The Original Complaint in this case;
 - b. Exhibit 2 – The 2015 Memorandum of Agreement between Defendant and 1199;
 - c. Exhibit 3 – The State Court's April 17, 2017 Order;
 - d. Exhibit 4 – The State Court's February 25, 2019 Order;
 - e. Exhibit 5 – The State Court's February 9, 2021 Order;
 - f. Exhibit 6 – Defendant's Notice of Appeal;
 - g. Exhibit 7 – The Amended Complaint in this case;
 - h. Exhibit 8 – Plaintiffs' Memorandum of Law in support of their Motion to Vacate the Stay;
 - i. Exhibit 9 – Defendant's second Notice of Removal;

3. I hereby declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief, and I am aware that should any of the above be materially false, I may be subject to a criminal penalty.

Executed on March 18, 2021

_____/s/_____
MICHAEL TAUBENFELD